

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554

In re:

)

)

Rulemaking under 47 CFR 97 of )  
The Communications Act of 1934, )  
as Amended, to Establish Technical )  
Docket no. RM-10740

Standards for Certain Amateur Radio )  
Telephony Transmissions )

)

To: The Commission

**Comments on Behalf of Douglas T. Smith Editorial Services**

I make the following comments on docket no. RM-10740 on behalf of Douglas T. Smith Editorial Services, of which I am sole proprietor. I edit a major Amateur Radio magazine, design radio equipment and stay active in both commercial and Amateur Radio.

WHEREAS:

1. The limitations on occupied bandwidth in the Amateur Radio Service are based on good engineering and amateur practice,

2. The rules are purposefully vague to allow and encourage Amateur Radio to continue its tremendous legacy of experimentation,

3. Our Service is largely self-regulated and all operators have promised to comply with the rules,

3. The proposed rulemaking ignores the requirements of digital voice (2k80J2E) and video (2k80J2F and 2k80J2W) systems, now being developed, that operate alongside analog voice and video systems in the HF Amateur Radio phone bands;

4. The petitioners incorrectly conclude that AM (6k00A3E) causes less interference than an equivalent-bandwidth SSB emission (6k000J3E),

5. The Amateur Radio HF bands are often crowded, and

6. Mutual interference is based not only on the occupied bandwidth of transmitters but also on the selectivity of receivers, transmitted power and gains of antennas, among other things,

We CONCLUDE that:

1. Further rulemaking on occupied bandwidth is unnecessary and unwanted. Enforcement of the existing rules concerning good amateur practice, cooperation and willful interference (47 CFR 101), and especially concerning the use of more power than necessary to maintain communications (47 CFR 313a) would mitigate interference much more effectively than the proposed rulemaking.

2. Interference in the Amateur Radio bands is caused, in part, by a lack of consideration among licensed operators.

3. Mutual interference would not be significantly reduced, no matter the bandwidth limitations imposed by the Commission, without attention to the ongoing abuses mentioned in my conclusion (1) above.

4. The petition for rulemaking should be dismissed.

Respectfully,

/s/ Douglas T. Smith, KF6DX  
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